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BY EMAIL

Honorable Analisa Torres
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In Re Search Warrant dated November 3, 2021, 21-mc-00819 (AT)

Dear Judge Torres:

Eric Cochran respectfully submits this letter in opposition to the government's letter dated January 11, 2022 in which it objects to the Special Master's recommendation that the parties split the costs of the Special Master and instead that Project Veritas and two individual former journalists, Eric Cochran and Spencer Meads, bear sole responsibility for payment. The Government's position should be rejected.

First, there is no law or authority to support the government's position. The Government cites not a single case in which a court ordered that the responding parties pay 100% of the costs of the Special Master appointed by the court. And the Government certainly cites no case in which the recommendation of the Special Master was rejected by the court based solely on the Government's bare and unsupported objection.

Second, the only fact that the Government cites to justify excusing it from any responsibility to pay for the Special Master costs is that it objected to the appointment of the Special Master in the first place (in contrast to other cases in which the government consented). In effect, the Government proposes that it be given an automatic veto power in all instances in which a Special Master is appropriate so that as a practical matter it would never be required to bear the costs so long as it merely objected. Again the government cites no law or authority for such a proposition.

Finally, the Government's proposal is particularly unfair as applied to Mr. Cochran, a 28-year-old former Project Veritas journalist. It is difficult to imagine any legitimate basis for imposing payment responsibility upon an individual in Mr. Cochran's position simply because the Government made the unilateral and ill-advised decision to resort to the use of the

unnecessarily intrusive search warrant, thus necessitating the appointment of a Special Master. The Government caused the Special Master to be appointed—it is only fair that the Government be required to pay for it.

Respectfully submitted,

/s/ Adam Hoffinger

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